

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re Alejandro Cruz-Maldonado

Debtor(s)

Case No. 21-12063

Chapter 13

ANSWER OF DEBTOR' TO MOTION FOR RELIEF FROM STAY

The debtor, Alejandro Cruz-Maldonado, through his attorney, hereby Answers the Motion of US Bank Trust National Association for Relief from Stay as follows:

1. Debtor filed a voluntary petition under Chapter 13 on July 25, 2021, and until last week, was unable to communicate, directly, with Moveant, to address post-filing mortgage payments.
2. Last Friday, Debtor did schedule mortgage payments, with Moveant, in the amount of \$1,605.87, which cures all post-petition arrears.
3. Debtor is now current on all post-petition mortgage payments.

WHEREFORE, the debtor respectfully requests that this Court deny the instant Motion for Relief, and that he be granted such other and further relief as is just and proper.

Dated: October 25, 2021

Respectfully submitted,

/s/Alaine V. Grbach

Alaine V. Grbach, Esquire